

The Honorable John H. Chun  
The Honorable David W. Christel

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MAHSA PARVIZ,

Petitioner,

v.

HOWARD BARRON (Warden, Federal  
Detention Center SeaTac), COLETTE  
PETERS (Director, Bureau of Prisons),

Respondents.

No. C23-1407-JHC-DWC

**MOTION FOR EXTENSION OF  
TIME TO FILE A RETURN TO A  
PETITION FOR HABEAS CORPUS  
UNDER 28 U.S.C. § 2241**

NOTING DATE: February 16, 2024

The United States moves for an extension of time of 30 days to file its answer to Petitioner Mahsa Parviz's *pro se* petition under 28 U.S.C. § 2241. Parviz is currently serving a 61-month term of imprisonment imposed in the Central District of California for *False Statement in a Passport Application*, in violation of Title 18, United States Code, Section 1542, and *Aggravated Identity Theft*, in violation of Title 18, United States Code, Section 1028A(a)(1). *United States v. Parviz*, No. 2:21-cr-00293-SB (C.D. Cal. filed June 22, 2021), Dkt. 124. Parviz is currently imprisoned at the Federal Detention Center in SeaTac, and her projected release date is January 3, 2026. *See* BOP Inmate Locator, *available at* <https://www.bop.gov/inmateloc/> (last visited Feb. 7, 2024).

On January 9, 2024, the Court issued an Order directing service of the petition by mail on the respondents, Howard Barron and Colette Peters, and the Office of the United

1 States Attorney for the Western District of Washington. Dkt. 16. The Court further  
 2 ordered the respondent to file a return to the petition within 30 days of such service. *Id.*  
 3 The petition was received by the U.S. Attorney's Office on January 17, 2024, making the  
 4 deadline for the return February 16, 2024. *See* Dkt. 19.

5 Parviz's petition challenges the computation of her sentence and her eligibility to  
 6 have time credits earned under the First Step Act applied to her sentence. Responding to  
 7 the petition requires review of Parviz's underlying federal conviction, her criminal  
 8 history, and her current appeals to the Ninth Circuit, which further requires coordination  
 9 with the U.S. Attorney's Office in the Central District of California. For this reason, the  
 10 respondents request additional time to evaluate Parviz's claims, as well as any defenses  
 11 available to the respondents. Moreover, an extension of time will not prejudice the  
 12 petitioner, as she has two years left on her sentence and would not be eligible for  
 13 immediate release even if the Court were to grant her requested relief.

14 For these reasons, the respondents respectfully request a 30-day extension of time  
 15 until March 11, 2024, for filing the answer to the *pro se* petition.

16 DATED this 7th day of February, 2024.

17 Respectfully submitted,

18 TESSA M. GORMAN  
 19 United States Attorney

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 7, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and to be served on the Petitioner, Mahsa Parviz who is proceeding *pro se*, by First Class Mail to the following address:

Masha Parviz, Registration No. 54652-509  
FDC SeaTac  
Federal Detention Center  
P.O. Box 13900  
Seattle, WA 98198

*s/ John M. Price*  
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